

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

**Civil Action No. 3:16-md-2738-
FLW-LHG**

MDL No. 2738

THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATION OF MICHELLE A. PARFITT, ESQ.

Michelle A. Parfitt, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Ashcraft & Gerel, LLP. I was appointed as Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.
2. I submit this Certification based on personal knowledge in support of the Plaintiff Steering Committee's Motion to Exclude the Opinions of Robert Kurman, M.D.
3. Attached hereto as Exhibit A is a true and correct copy of the Expert Report of Robert Kurman, M.D., dated February 25, 2019.
4. Attached hereto as Exhibit B is a true and correct copy of the Deposition of Robert Kurman, M.D., dated April 2, 2019.

5. Attached hereto as Exhibit C is a true and correct copy of Terry, et al., *Genital powder use and risk of ovarian cancer: A pooled analysis of 8,525 cases and 9,859 controls*, CANCER PREV RES, 2013;6:811-821.

6. Attached hereto as Exhibit D is a true and correct copy of Penninkilampi and Eslick, *Perineal talc use and ovarian cancer: A systematic review and meta-analysis*, Epidemiology, 2018;29:41-49.

7. Attached hereto as Exhibit E is a true and correct copy of Schildkraut, et al., *Association between body powder use and ovarian cancer: The African-American Cancer Epidemiology Study*, Cancer Epidemiol Biomarkers Prev, 2016;25(10);1411-7.

8. Attached hereto as Exhibit F is a true and correct copy of Ness, et al., *Does talc exposure cause ovarian cancer?*, Int J Gynecol Cancer, 2015 May;25 Suppl 1:51.

9. Attached hereto as Exhibit G is a true and correct copy of Taher, et al., *Systematic review and meta-analysis of the association between perineal use of talc and risk of ovarian cancer*, publication pending, accepted by Health Canada for its review, 2018.

10. Attached hereto as Exhibit H is a true and correct copy of McDonald, et al., *Correlative polarizing light and scanning electron microscopy for the assessment of talc in pelvic region lymph nodes*, Ultrastructural Pathology, 2019.

11. Attached hereto as Exhibit I is a true and correct copy of Fletcher et al., *Molecular basis supporting the association of talcum powder use with increased risk of ovarian cancer*, Reproductive Sciences, 2019.

12. Attached hereto as Exhibit J is a true and correct copy of *Draft Screening Assessment, Talc, Environment and Climate Change Canada*, Health Canada, December 2018.

13. Attached hereto as Exhibit K is a true and correct copy of the Rule 26 Expert Report of Sarah E. Kane, M.D., dated November 15, 2018.

14. Attached hereto as Exhibit L is a true and correct copy of the FDA Response to Samuel S. Epstein, M.D.'s Citizen Petitions, dated April 1, 2014.

15. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: May 7, 2019

/s/ Michelle A. Parfitt
Michelle A. Parfitt